

04.01-11/13/96-00957



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Date: November 13, 1996

Mr. Richard N. Stryker
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
Sites 9 and 19
Review of the Navy's draft *Proposed Plan*

Dear Mr. Stryker:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's draft *Proposed Plan* for Sites 9 and 19, located at the Naval Weapons Station-Yorktown, and we offer the following comments and concerns:

1. Since there has been no agreement amongst the Parties as to what remediation levels are acceptable for the various media associated with Sites 9 and 19, it is difficult to agree or disagree with the proposals outlined in the draft *Proposed Plan*. It is recommended that the RI and FS for an Operable Unit be close to finalization before the submittal of a draft *Proposed Plan* for review. Essentially, a draft *Proposed Plan* submitted before consensus is reached amongst the Parties is doomed to be revised, and is hence better left for review at a later date.
2. There is no discussion of ARARs in the draft *Proposed Plan*. Please include a brief discussion in the Summary of Alternatives section. Of significance is the identification of ARARs that may influence the scope and cost of the remedial alternatives under consideration. Are the soils at Site 9 and 19 contaminated with listed hazardous wastes? Each ARAR needs to be identified for each remedial alternative. The discussion and presentation in this section of the draft *Proposed Plan* is very weak.
3. There is absolutely no discussion of remediation/clean-up levels in the draft *Proposed Plan*. This is unacceptable in a Proposed Plan. It is impossible to evaluate remedial action alternatives without specifying a goal, i.e. a cleanup

requirement.

4. There is no presentation of the actual human health and environmental risks associated with each media for Sites 9 and 19. It is unacceptable to merely state that the calculated risks "...fall within EPA's acceptable carcinogenic risk range of 10^{-4} to 10^{-6} alone. Please present actual numbers for each scenario.
5. The extent of excavation should be detailed on a map in the final *Proposed Plan*. The PRAP should clearly indicate that contaminated sediment will be included in the treatment chosen for the selected remedy.
6. It is not acceptable to include groundwater and surface water in a final *Proposed Plan* for Sites 9 and 19 without evaluating the impacts to Lee Pond.
7. The Community Participation section needs to address the following:
 - Location of information repositories
 - Names, phone numbers, and addresses of lead and support agency personnel
 - Dates of the public comment period
 - Anticipated date of public meeting

This concludes EPA's review comments concerning the Navy's draft *Proposed Plan* for Sites 9 and 19, located at the Naval Weapons Station-Yorktown. If you have any questions regarding the above, please feel free to call me at (215) 566-3357,

Sincerely,



Robert Thomson, PE
Superfund Federal Facilities (3HW50)

cc: Steve Mihalko (VDEQ, Richmond)
Jeff Harlow (WPNSTA, 09E)
Bruce Rundell (USEPA, 3HW41)
Barbara Okorn (USEPA, 3HW41)
Nancy Jafolla (USEPA, 3HW41)